

FILED

FEB 21 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. RUSSONIELLO (CASBN 44332)
United States Attorney

BRIAN J. STRETCH (CASBN 163973)
Chief, Criminal Division

ALLISON MARSTON DANNER (CASBN 195046)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7144
Fax: (415) 436-7234
Email: allison.danner@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY CRAIG,

Defendant.

No. 08-70096

UNITED STATES' APPLICATION TO
SEAL COMPLAINT AND ~~PROPOSED~~
ORDER

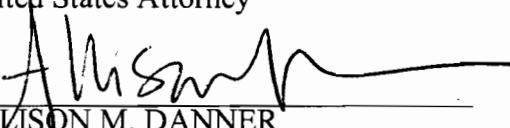
The government hereby moves the Court for an order sealing the complaint and accompanying affidavit, this motion, and the Court's sealing order until further order of the Court. Because of the heavy penalties associated with the charges in this case, the United States is concerned that Craig poses a risk of flight if he learns of the complaint in this matter before he is arrested and brought before the Court for his initial appearance. Should the Court grant this motion, the government intends to ask the Court to unseal the complaint at Craig's initial appearance. The United States requests that this Court order the Clerk of the Court to furnish copies of the arrest warrant to the United States Attorney's Office and to the Napa County

1 Sheriff's Office. The United States also requests copies of the sealed complaint and this
2 application and order.

3 DATED: February 21, 2008

Respectfully submitted,


4 JOSEPH P. RUSSONIELLO
5 United States Attorney

6 
7 ALLISON M. DANNER
8 Assistant United States Attorney

9
10
11 **[PROPOSED] ORDER**

12 Based upon the motion of the government and for good cause shown, IT IS HEREBY
13 ORDERED that the complaint and affidavit, this motion, this sealing order, and all related papers
14 shall be sealed until further order of the Court. The Clerk of the Court is ordered to furnish
15 copies of the Complaint and arrest warrant in this matter to the United States Attorney's Office
16 and to the Napa County Sheriff's Office. The Clerk of the Court is also ordered to furnish copies
17 of the United States' Sealing Application and this Sealing Order to the United States Marshals
18 Service, the Napa County Sheriff's Office, and the U.S. Attorney's Office.

19
20 DATED: February 21, 2008

21 
22 MARIA-ELENA JAMES
23 United States Magistrate Judge
24
25
26
27
28